

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF OREGON  
3 PORTLAND DIVISION  
4

5 KELLY CAHILL, et al.,  
6 individually and on behalf  
7 of others similarly situated,

8 Plaintiffs,

9 v.

No. 3:18-cv-01477-JR

10 NIKE INC., an Oregon  
11 corporation,

12 Defendant.

13  
14 DEPOSITION OF CHESTER HANVEY, Ph.D.

15 FRIDAY, OCTOBER 29, 2021

16 SAN DIEGO, CALIFORNIA

17  
18  
19  
20  
21  
22  
23  
24 Reported by: Marilynn Hoover, RPR  
25 Oregon CSR No. 04-0387

1 evaluating the employment and HR practices at Nike?

2 MS. DAVIS: Objection. That question is a  
3 legal conclusion -- calls for a legal conclusion or  
4 expert -- well, calls for a legal conclusion and  
5 calls for speculation.

6 THE WITNESS: Can you repeat the question.

7 Q. BY MR. BARRY GOLDSTEIN: In your opinion,  
8 do you think that, as a result of experience,  
9 training, and education, Dr. Lundquist has gained  
10 specialized knowledge for evaluating the employment  
11 and HR practices at Nike?

12 MS. DAVIS: Objection. Calls for a legal  
13 conclusion. Calls for speculation.

14 THE WITNESS: I don't know about  
15 Dr. Lundquist specifically, but I think those are  
16 certainly areas of competency for IO psychologists.

17 Q. BY MR. BARRY GOLDSTEIN: Do you think that  
18 Dr. Lundquist has specialized knowledge, beyond  
19 common knowledge, regarding compensation practices?

20 MS. DAVIS: Objection. Calls for a legal  
21 conclusion. Calls for speculation.

22 THE WITNESS: I'm not sure about her  
23 experience specifically on that topic.

24 Q. BY MR. BARRY GOLDSTEIN: What about HR  
25 practices?

1 STATE OF CALIFORNIA )

) SS.

2 COUNTY OF SAN DIEGO )

3 I, MARILYNN HOOVER, CSR No. 04-0387 for the  
4 State of Oregon, do hereby certify:

5 That prior to being examined, the witness named  
6 in the foregoing deposition was duly sworn to  
7 testify the truth, the whole truth, and nothing but  
8 the truth;

9 That said deposition was taken down by me in  
10 shorthand at the time and place therein named, and  
11 thereafter reduced by me to typewritten form; and  
12 that the same is a true, correct, and complete  
13 transcript of the said proceedings.

14 Before completion of the deposition, review of  
15 the transcript [X] was [ ] was not requested. If  
16 requested, any changes made by the deponent (and  
17 provided to the reporter) during the period allowed  
18 shall be appended hereto.

19 I further certify that I am not interested in  
20 the outcome of the action.

21 Witness my hand this 31st day of October 2021.

22 

23  
24 Marilynn Hoover, RPR

25 CSR No. 04-0387; Exp. 03/31/2023

**Errata Sheet for the Deposition of Chester Hanvey, Ph.D.****Taken on October 29, 2021 in the matter of *Cahill, et al. v. Nike, Inc.***

<b>Page</b>	<b>Line</b>	<b>Reads</b>	<b>Should Read</b>	<b>Reason</b>
8	24	I'm quite	I might be	Transcription error
18	8	I do	I did	Transcription error
23	2	Tylene	Tyleen	Misspelling
23	3	Zarina Shipa	Zareena Shefa	Misspelling
24	16	specific	certain	Transcription error
26	18	set	study	Transcription error
28	14	I don't think so	I don't know...	Transcription error
34	13	Modeling	Bottling	Transcription error
37	3	It does	It does not...	Transcription error and to clarify the record as reflected in later testimony
62	11	how	or how	Transcription error
71	20	collected	the plaintiffs' expert collected	Clarification
78	25	Alberto	Aburto	Misspelling
99	6	of the	of	Transcription error
100	18	setting	studying	Transcription error
107	20	I	they	Transcription error
116	24	the	a	Transcription error
167	23	someone else's	some of that	Transcription error
168	2	increase	equity	Transcription error
189	16	Johansen	Johansson	Misspelling
190	1	Johansen	Johansson	Misspelling
190	22	Johansen	Johansson	Misspelling
192	1	Johansen	Johansson	Misspelling
193	23	a number of	appropriate	Transcription error
200	2	like the one	like one	Transcription error
219	2	I didn't look	I did look	Transcription error
219	3	unfamiliar	familiar	Transcription error
223	9	essential	central	Transcription error
223	24	Alberto	Aburto	Misspelling
224	17	Alberto	Aburto	Misspelling
225	6	conflicts	confidence	Transcription error
225	13	differences of	differences or	Transcription error
230	3	bias	biased	Transcription error
230	15	Band B	Band V	Transcription error
246	13	asks	is asked	Transcription error

252	23	in this case,	in this case (Kassman v. KPMG),	Clarification
263	1	said	has ever said	Clarification

I attest that the above-referenced changes are true and correct.

Date: November 19, 2021

DocuSigned by:  
  
B8910886EB8745C...  
Chester Hanvey, Ph.D.